

REMARKS

The following remarks are provided in support of the pending claims and responsive to the Office Action of January 4, 2005.

Although the Examiner alleges that claims 1-22 are unpatentable over *Tsutsumi et al.* in view of *Singhal*, the Applicant respectfully disagrees. The Applicant maintains that the prior art does not provide support for the invention as taught in the original claims. In the amendment hereto, Applicant has included two additional claims 23-24 that further define the invention in view of the prior art. More specifically, neither *Tsutsumi et al.* nor *Singhal* teaches the formula for measuring proximity as shown in claim 23. In view of the forgoing amendments and remarks, it is submitted that all of the claims remaining in the application are now in condition for allowance and such action is respectfully requested. Should any questions arise in connection with this application or should the Examiner believe that a telephone conference with the undersigned would be helpful in resolving any remaining issues pertaining to this application, the undersigned respectfully requests that she be contacted at the number indicated below.

For the reasons outlined above, withdrawal of the rejection of record and an allowance of this application are respectfully requested.

Respectfully submitted,

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